

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

CITY OF HOLLYWOOD	)	Civ. No. 24-cv-1743 (JMB/DTS)
FIREFIGHTERS' PENSION FUND,	)	
Individually and on Behalf of All Others	)	<u>CLASS ACTION</u>
Similarly Situated,	)	
	)	STIPULATION REGARDING
Plaintiff,	)	SCHEDULE FOR CONSOLIDATED
	)	COMPLAINT AND MOTION TO
vs.	)	DISMISS BRIEFING
	)	
UNITEDHEALTH GROUP INC., et al.,	)	
	)	
Defendants.	)	
	)	

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Lead Plaintiff California Public Employees Retirement System (“CalPERS”) and UnitedHealth Group Inc., Andrew Witty, Stephen Hemsley, and Brian Thompson (collectively, “Defendants”) (and together with CalPERS, the “Parties”), by and through their undersigned counsel, stipulate and agree and jointly request that the Court approve the Parties’ proposed schedule set forth below:

WHEREAS, a putative class action was filed against Defendants on May 14, 2024 styled *City of Hollywood Firefighters’ Pension Fund, et al. v. UnitedHealth Group Inc., et al.*, No. 0:24-cv-01743 (D. Minn.) (ECF 1);

WHEREAS, by Order dated June 6, 2024, the Court required that the Parties shall submit to the Court a proposed schedule within 14 days of the entry of an order appointing lead plaintiff and lead counsel (ECF 7);

WHEREAS, by Order dated July 29, 2024, the Court appointed CalPERS to serve as Lead Plaintiff and Robbins Geller Rudman & Dowd LLP to serve as Lead Counsel in this litigation (ECF 32);

WHEREAS, Defendants expressly reserve all rights and defenses, including any objections to the Court’s jurisdiction, and nothing in this Stipulation shall be construed as a waiver of any right or defense available to them;

WHEREAS, the Parties, through their undersigned counsel, have met and conferred to discuss a schedule for the filing of a consolidated complaint, Defendants’ response thereto, and a briefing schedule for any motion to dismiss, and have agreed to the schedule set forth below.

IT IS ACCORDINGLY STIPULATED, subject to this Court’s approval, that:

1. CalPERS shall file a consolidated complaint on or before October 4, 2024;
2. Defendants shall answer, move, or otherwise respond to CalPERS' consolidated complaint on or before December 3, 2024;
3. CalPERS shall file an opposition to any motion to dismiss filed by Defendants on or before February 3, 2025;
4. Defendants shall file a reply on or before March 5, 2025.

Stipulated by and between:

DATED: August 9, 2024

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s/ ROBERT R. HENSSLER JR.  
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DATED: August 9, 2024

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s/ PETER C. MAGNUSON  
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